

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

SEB INVESTMENT MANAGEMENT AB,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

v.

ENDO INTERNATIONAL PLC, *et al.*,

Defendants.

Civ. A. No. 2:17-CV-3711-TJS

ELECTRONICALLY FILED

**LEAD PLAINTIFF’S MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND PLAN OF ALLOCATION AND CERTIFICATION OF
SETTLEMENT CLASS TO EFFECTUATE THE SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Lead Plaintiff SEB Investment Management AB (“Lead Plaintiff”) hereby moves this Court, before the Honorable Timothy J. Savage, on December 11, 2019 at 10:00 a.m. in Courtroom 9A of the James A. Byrne U.S. Courthouse, 601 Market Street, Philadelphia, PA, 19106, or at such other location and time as set by the Court, for: (i) entry of a judgment approving the proposed Settlement of the Action as set forth in the Stipulation and Agreement of Settlement dated August 22, 2019 (“Stipulation”) as fair, reasonable, and adequate; (ii) entry of an Order approving the Plan of Allocation as fair, reasonable, and adequate; and (iii) certification of the Settlement Class for purposes of effectuating the Settlement.¹

¹ All capitalized terms that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

This Motion is based upon the accompanying Declaration of Sharan Nirmul in Support of (I) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation and Certification of Settlement Class to Effectuate the Settlement; and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses, the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation and Certification of Settlement Class to Effectuate the Settlement, and all other papers and proceedings herein.

Dated: November 1, 2019

Respectfully submitted,

**KESSLER TOPAZ MELTZER
& CHECK, LLP**

s/ Sharan Nirmul

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*Counsel for Lead Plaintiff SEB Investment
Management AB and the Settlement Class*

CERTIFICATE OF SERVICE

I, Sharan Nirmul, hereby certify that on November 1, 2019, a true and correct copy of the foregoing motion and supporting documents has been electronically filed with the Clerk of Court, is available for viewing and downloading from the ECF system, and will be served by operation of the Court's ECF system to all counsel of record.

s/ Sharan Nirmul

Sharan Nirmul